

FILED

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2003 OCT 27 PM 3:30

CLERK, U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

Attorneys for Defendants  
ABB INC. (formerly named  
ABB Power T&D Company, Inc.)  
and ASEA BROWN BOVERI, INC.

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

ALI FARAHANI, an individual,

Plaintiff,

v.

ABB POWER T&D COMPANY, INC.; ASEA  
BROWN BOVERI, INC., and ABB, INC.,

Defendants.

NO. LACV03-7583 AHM PLAx

DECLARATION OF DANNY E.  
JULIAN IN SUPPORT OF  
DEFENDANTS ABB INC. AND  
ASEA BROWN BOVERI, INC.'S  
MOTION TO DISMISS ACTION  
UNDER F.R.C.P. 12(b)(3)  
BECAUSE OF IMPROPER VENUE

Date: November 17, 2003

Time: 10:00 a.m.

Place: Courtroom 14

The Honorable A. Howard Matz

OCT 28 2003

JULIAN DECLARATION

IN SUPPORT OF MOTION TO DISMISS

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I, DANNY E. JULIAN, declare:

1. I have personal knowledge of the facts contained in this Declaration, and, if called on, could and would testify to them.

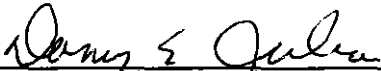
2. I employed as Principal Consulting R&D Engineer for ABB Inc., which, before July 2001, was named ABB Power T&D Company, Inc. At all times, my office has been located at ABB's offices in Raleigh, North Carolina.

3. In March 2001, Plaintiff Ali Farahani traveled to ABB's offices in Raleigh, North Carolina, on ABB business. I met with Mr. Farahani, along with other ABB employees, on March 15, 2001. The meetings took place at ABB's offices in Raleigh, North Carolina.

4. Thereafter, I had periodic conversations with Mr. Farahani regarding ABB business on approximately a monthly basis from my office in Raleigh, North Carolina.

I declare under penalty of perjury under the laws of the United States of America.

Executed on October 23, 2003, at Raleigh, North Carolina.

  
DANNY E. JULIAN

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**PROOF OF SERVICE**

I, the undersigned, am over the age of eighteen years and am a resident of San Joaquin County, California. I am not a party to this action. My business address is c/o 146 West Weber Avenue, Stockton, California 95202.

On October 24, 2003, I served the following document:

**DECLARATION OF DANNY E. JULIAN IN SUPPORT OF DEFENDANTS ABB  
INC. AND ASEA BROWN BOVERI, INC.'S MOTION TO DISMISS ACTION  
UNDER F.R.C.P. 12(b)(3) BECAUSE OF IMPROPER VENUE**

Addressed to:

Perry Roshan-Zamir  
Law Offices of Perry Roshan-Zamir  
2530 Wilshire Blvd., Third Floor  
Santa Monica, CA 90403

XX (BY MAIL) placing the envelope for collection and mailing on the date and at the place showing below following our ordinary business practices. I am readily familiar with the business practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid.

Executed October 24, 2003, at Stockton, California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

  
DOMINIQUE A. BROWN